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11 Attorneys for Plaintiffs Oracle USA, Inc.,
12 Oracle America, Inc., and Oracle International
Corp.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ORACLE USA, INC. a Colorado corporation; ORACLE AMERICA, INC., a Delaware corporation; and ORACLE INTERNATIONAL CORPORATION, a California corporation.

Plaintiffs.

V

22 RIMINI STREET, INC., a Nevada
23 corporation; SETH RAVIN, an
individual

Defendants.

Case No. 2: 10-cv-0106-LRH-PAL

**DECLARATION OF CHAD RUSSELL IN
SUPPORT OF PLAINTIFFS' MOTION TO
MODIFY PROTECTIVE ORDER**

1 I, Chad Russell, declare as follows:

2 1. I am member of the State Bar of California and an associate at Bingham
3 McCutchen LLP, counsel of record for Plaintiffs Oracle USA, Inc., Oracle America, Inc. and
4 Oracle International Corporation (collectively, "Oracle") in this action. I have personal
5 knowledge of the matters stated in this declaration by virtue of my representation of Oracle in
6 this action. If called and sworn as a witness, I could and would competently testify as to such
7 matters.

8 2. I, as well as other attorneys at Bingham McCutchen, LLP, have met and conferred
9 with counsel for CedarCrestone, Inc. ("CedarCrestone") to attempt to reach agreement about the
10 relief Oracle seeks without involving the Court. To date, CedarCrestone has denied multiple
11 requests to waive or modify the Protective Order as requested by Oracle.

12 3. Attached as **Exhibit A** is a true and correct copy of a statement signed by Rick
13 Riordan, Executive Vice-President Shared Services of CedarCrestone, dated October 30, 2009,
14 as used as an exhibit at the deposition of CedarCrestone's corporate representative, Paul
15 Simmons, labeled Plaintiffs' Exhibit No. 1301. CedarCrestone has designated this exhibit as
16 "Highly Confidential Information - Attorneys' Eyes Only."

17 4. Attached as **Exhibit B** is a true and correct copy of Oracle's Subpoena To
18 Produce Documents, Information, Or Objects Or To Permit Inspection Of Premises, addressed to
19 CedarCrestone.

20 5. Attached as **Exhibit C** is a true and correct copy of a stipulation, dated July 19,
21 2011, entered into by CedarCrestone, Oracle and defendant Rimini Street, Inc.

22 6. Between March 24, 2011 and July 22, 2011, CedarCrestone produced
23 approximately 625 pages of documents and a disk of software materials containing
24 approximately 2.16 GB of files. The majority of these documents and materials have been
25 designated as either "Confidential Information" or "Highly Confidential Information - Attorneys'
26 Eyes Only" by CedarCrestone.

27 7. On December 1, 2011, Oracle took the deposition of CedarCrestone's corporate
28 representative, Paul Simmons. Attached as **Exhibit D** is a true and correct copy of excerpts of

1 the transcript of that deposition. CedarCrestone has designated the entirety of this transcript
2 "Highly Confidential Information - Attorneys' Eyes Only."

3 8. Attached as **Exhibit E** is a true and correct copy of the deposition subpoena
4 served by Oracle on CedarCrestone as used as an exhibit at the deposition CedarCrestone's
5 corporate representative, Paul Simmons, labeled Plaintiffs' Exhibit No. 1300. CedarCrestone
6 has designated this exhibit as "Highly Confidential Information - Attorneys' Eyes Only."

7 I declare under penalty of perjury that the foregoing is true and correct. Executed
8 in San Francisco, California, on May 14, 2012.

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Chad Russell